

1 THE HONORABLE CHIEF JUDGE MARTINEZ
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10 UNITED STATES DISTRICT COURT
11 WESTERN DISTRICT OF WASHINGTON
12 AT SEATTLE

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26 UNITED STATES OF AMERICA,) No. CR18-217-RSM
Plaintiff,)
v.) DEFENDANT WOOLARD'S TRIAL
BRADLEY WOOLARD,) BRIEF
Defendant.)

Bradley Woolard submits this brief in advance of the trial set to commence on July 19, 2021. The government has predicted a trial lasting three to four weeks. The government has listed 77 witnesses and filed an exhibit list that runs 109 pages and indicates in excess of 1700 trial exhibits.

The Charges

Bradley Woolard is charged in the following counts in the Fourth Superseding Indictment:

- Ct. 1 Conspiracy to Distribute Controlled Substances
Ct. 2 Possession of Fentanyl with Intent to Distribute on 4/19/18
Ct. 3 Possession of Fentanyl with Intent to Distribute on 5/6/18
Ct. 4 Possession of Fentanyl with Intent to Distribute on: 7/24/18
Ct. 5 Possession of Fentanyl with Intent to Distribute on 7/27/18
Ct. 6 Possession of Furanyl Fentanyl with Intent to Distribute on 7/28/18

1 Ct. 7 Felon in Possession of a Firearm: This charge was dismissed
2 Ct. 8 Unlawful User of a Controlled Substance in Possession of a Firearm
3 Ct. 9 Possession of a Firearm in Furtherance of a Drug Trafficking Offense
4 Ct. 10. Attempted Possession of Furanyl Fentanyl with Intent to Distribute on 8/6/18
5 Ct. 13 Conspiracy to Commit Money Laundering
6 Ct. 14-27 Money Laundering
7 Ct. 28 Possession of Furanyl Fentanyl with Intent to Distribute on 7/22/18
8 Ct. 29 Attempted Possession of Furanyl Fentanyl with Intent to Distribute on 8/3/18
9 Ct. 34 Attempted Possession of Furanyl Fentanyl with Intent to Distribute on 8/15/18
10 Ct. 47 Attempted Possession of Furanyl Fentanyl with Intent to Distribute on 8/8/18
11 Ct. 48 Possession of Furanyl Fentanyl with Intent to Distribute on 8/16/18

12 Mr. Woolard has entered a plea of not guilty to each charge.

13 **Pretrial Motions:**

14 The Court heard and decided several pretrial motions regarding the admissibility
15 of evidence and procedural matters. Defendant's Motion to Suppress pursuant to
16 Franks, Dkt. 65 has not yet been decided. That decision will impact the admissibility of
17 several items of evidence sought to be introduced by the government.

18 **Jury Instruction Issues**

19 By separate pleading the defense has either joined in proposed jury instructions
20 or submitted modified Ninth Circuit instructions. In particular the defense has proposed
21 modification of the Ninth Circuit instruction as to Count 9 involving the charge
22 pursuant to 18 USC 924(c).

23 **Motions in Limine**

24 All parties have submitted motions in limine regarding evidentiary issues. In
25 particular the defense has challenged evidence the government seeks to introduce
26 pursuant to FRE 404(b). The Court has not yet decided those motions.

1 **Other Trial Issues**

2 Mr. Woolard joins in the arguments and motions made by codefendant Pelayo in
3 his trial brief at ECF Dkt. 771.

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5 Dated this 5th day of July, 2021.

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7 */s/Peter A. Camiel*
8 Peter A. Camiel WSBA 12596

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